

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Donald Black, Marcia Black, Larry
Martin, Rebecca Martin, Barbara
Thompson, and James Thompson,

For themselves and a Class of Similarly
Situated Plaintiffs,

Plaintiffs,

vs.

Mantei & Associates, Ltd., Ricky Alan
Mantei, Cindy Chiellini, Centaurus
Financial, Inc., and J.P. Turner &
Company, L.L.C,

Defendants.

) C/A NO. 3:23-cv-04149-MGL

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**DECLARATION OF
CRAIG McCANN, Ph.D., CFA**

I, Craig McCann, Ph.D., CFA, being competent and over the age of twenty-one, do hereby voluntarily and knowingly swear, declare, and affirm the following from my own personal knowledge:

1. I have been retained as an expert witness in this matter. The report I prepared and submitted in this case and my curriculum vitae are found in Docket Number 1-1 in this case's electronic records. I have been qualified as an expert witness in federal court, state court, and in arbitration proceedings. I have also been retained by the Securities and Exchange Commission and multiple state regulators in a wide range of securities and investment-related matters, including matters related to structured products.

2. I have reviewed the Declaration of Bryan A. Gless filed in this case and the prospectuses attached to his declaration.

3. I have independently confirmed that the last of the four series of Barclays Bank PLC American Depositary Shares (ADS) referenced in Mr. Gless's declaration was called on December 15, 2018. From that time forward, these four ADSs did not and could not form any part of Barclays Bank PLC's debt structure. They consequently could not be, and were not, equal or subordinated debt after December 15, 2018, to any Barclays Bank PLC notes, including the 37 notes listed in my report. Stated differently, the 37 Barclays Bank PLC notes could not have been equal or senior to the four ADSs after December 15, 2018.

4. I have also reviewed the trade blotter produced by Defendant Centaurus Financial, Inc. at CENTAURUS-BLACK-REG-016841. This blotter shows that putative class members were sold four of the Barclays Bank PLC notes after December 15, 2018. These products bear the CUSIPs 06741TSE8, 06741TPR2, 06741TVK0, and 06741TRP4.

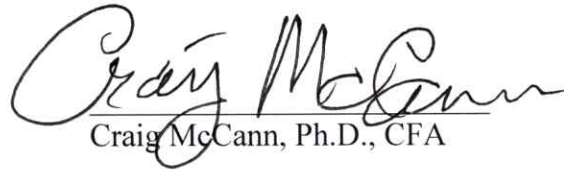
5. The blotter also confirms putative class members held 36 of the Barclays Bank PLC notes identified in my report for some period after December 15, 2018. The Barclays Bank PLC note identified as BACR 14 PERP Corp (ISIN No. XS0397801357) was not called until June 15, 2019, but based on the data currently available to me it is unclear whether the security was still owned by a putative class member. I would also note that paragraph 66 of my Expert Report dated July 21, 2023, states as follows:

These are preliminary primary opinions. I reserve the right to modify, update, amend and or supplement these preliminary opinions as additional discovery is produced in this case.

Consistent with this reservation, further discovery should clarify whether this note was owned by a putative class member after December 15, 2018. I would further point out that this one note amounts to an insignificant and immaterial part of my overall theories of damages and can be easily adjusted if further discovery reflects that adjustment is warranted.

Further Declarant sayeth naught.

Respectfully submitted this 14th day of September, 2023.



Craig McCann, Ph.D., CFA